Earl Handshoe, Jr.Corporate Administrator
Coachman Recreational Vehicle - Indiana Plant 900
423 N.Main Street P.O.Box 30
Middlebury, Indiana 46540

Re: Registered Construction and Operation Status,
CP039-10589-00514

Dear Earl Handshoe:

The application from Coachman Recreational Vehicle - Indiana Plant 900, received on February 01, 1999, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following operation to manufacture recreational vehicles and non-motorized trailers, to be located at 65275 Elder Drive, Goshen, Indiana, 46256 is classified as registered:

(a) One (1) surface coating and accessory solvents booth for towable travel trailers, identified as P-900, with a maximum capacity of twenty (20) trailer units per day, using aerosol can spraying method;
(b) One (1) adhesive application area, coating a maximum of twenty (20) trailer units per day.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

   (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

   (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

2. Pursuant to 326 IAC 6-3, the particulate matter (PM) from the painting emission unit shall be limited by the following:

   Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

   E = 4.1 (P)**0.67 where E = rate of emission in pounds per hour and
   P = process weight rate in tons per hour

3. Fugitive Dust Emissions [326 IAC 6-4]

   The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

   This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.1.

4. This source is located in Elkhart County and is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

   An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

   Compliance Data Section
   Office of Air Management
   100 North Senate Avenue
   P.O. Box 6015
   Indianapolis, IN 46206-6015

   no later than March 1 of each year, with the annual notice being submitted in the format attached.

   An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

GS

cc: File – Elkhart County
Elkhart County Health Department
Air Compliance – Rick Reynolds
Northern Regional Office
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak
Office of Enforcement

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

Company Name:	Coachman Recreational Vehicle - Indiana Plant 900
Address:	65275 Elder Drive
City:	Goshen, Indiana 46526
Authorized individual:	Earl Handshoe, Jr.Corporate Administrator
Phone #:	**(219) 825-8493**
Registration #:	**039-10589-00514**

I hereby certify that **Coachman Recreational Vehicle – Indiana Plant 900** is still in operation and is in compliance with the requirements of Registration **039-10589-00514**.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Coachman Recreational Vehicle – Indiana Plant 900
Source Location:	65275 Elder Drive, Goshen, Indiana 46526
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	039-10589-00514
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed an application from Coachman Recreational Vehicle – Indiana Plant 900 relating to the construction and operation of source for the manufacture of recreational vehicles and non-motorized trailers.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

(a) One (1) surface coating and accessory solvents booth for towable travel trailers, identified as P-900, with a maximum capacity of twenty (20) trailer units per day, using aerosol can spraying method;

(b) One (1) adhesive application area, coating a maximum of twenty (20) trailer units per day.

Existing Approvals

This is a new source and no previous permits, registrations, modifications, or exemptions have been issued to the source.

Stack Summary

There are no stacks for this source.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application submitted by the applicant.

A complete application for the purposes of this review was received on February 01, 1999.

Emission Calculations

See page 1 and 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as Athe maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.@

Pollutant	Potential To Emit (tons/year)
PM	0.06
PM-10	0.06
SO_2	-
VOC	24.86
CO	-
NO_x	-

HAPs	Potential To Emit (tons/year)
Hexane	**7.9**
Toluene	***4.21***
TOTAL	12.11

(a) The potential to emit (PTE, as defined in 326 IAC 2–1.1-1) particulate matter, PM-10 and volatile organic compounds (VOC) is less than 25 tons per year for each pollutant, but the PTE VOC is greater than 10 tons per year. Therefore, pursuant to 326 IAC 2-5.1-2, a registration is required.

(b) The potential to emit (PTE, as defined in 326 IAC 2–1.1-1) any single HAP is less than ten (10) tons per year and the PTE all HAPs combined is less than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 2-5.1-3, a construction permit is not required.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status **(attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)**
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	maintenance
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.06
PM10	0.06
SO_2	-
VOC	24.86
CO	-
NO_x	-
Single HAP	7.9
Combination HAPs	12.11

(a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1(Major Sources of Hazardous Air Pollutants)

This rule does not apply because the potential to emit for single HAP is less than 10 tons per year and the potential to emit a combination of HAPs is less than 25 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This operation paints metal parts. This rule is not applicable because the potential to emit VOC emissions are less than 15 pounds per day. This is less than the applicability of rule 8-2.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the painting emission unit shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand

(60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Conclusion

The construction and operation of this source for manufacture of recreational vehicles and non-motorized trailers shall be subject to the conditions of the attached proposed **Registered Construction and Operation Status 039-10589-00514.**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Coachman Recreational Vehicle - Indiana Plant 900**
Address City IN Zip: **65275 Elder Drive, Goshen, Indiana 46526**
CP: **039-10589**
Plt ID: **039-00514**
Reviewer: **Gurinder Saini**
Date: **03/28/00**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Touch-up Paint	7.8	95.00%	20.0%	75.0%	22.0%	50.00%	0.08000	0.830	7.50	5.85	0.39	9.32	1.70	0.06	11.70	50%
Adhesive Coating	8.91	55.00%	0.0%	55.0%	0.0%	45.00%	1.30000	0.830	4.90	4.90	5.29	126.90	23.16	0.00	10.89	100%
State Potential Emissions			**Add worst case coating to all solvents**								**5.68**	**136.23**	**24.86**	**0.06**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Coachman Recreational Vehicle - Indiana Plant 900
Address City IN Zip: 65275 Elder Drive, Goshen, Indiana 46526
CP#: 039-10589
Plt ID: 039-00514
Permit Reviewer: Gurinder Saini
Date: 03/28/00

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % Toluene	Hexane Emissions (ton/yr)	Toluene Emissions (ton/yr)
Adhesive	8.91	1.300000	0.83	18.75%	10.00%	7.90	4.21

Total State Potential Emissions **7.90** **4.21**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lb